

JaVonne M. Phillips, Esq. SBN 187474  
Merdaud Jafarnia, Esq. SBN 217262  
**McCarthy & Holthus, LLP**  
1770 Fourth Avenue  
San Diego, CA 92101  
Phone (877) 369-6122  
Fax (619) 685-4811

Attorneys for Secured Creditor, Wells Fargo Bank, N.A.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re: ) Case No. 16-43556-WJL  
)  
Paul Anthony Green dba RXDS Association, ) Chapter 13  
)  
Debtor. )  
) **PREHEARING**  
) **STATEMENT**  
)  
) Date: 12/20/17  
) Time: 9:30 AM  
) Ctrm: 220  
) Place: 1300 Clay Street  
) Oakland, CA 94604  
)  
) Judge William J. Lafferty  
)

Wells Fargo Bank, N.A., its assignees and/or successors, ("Secured Creditor") in the above-entitled Bankruptcy proceeding, hereby submits the following Prehearing Statement pursuant to its relief from Automatic stay.

1. Secured Creditor has reviewed and approved the proposed Adequate Protection Agreement on 12/4/17. A copy of same was sent to Debtor's Attorney on 12/4/17 for their review and signature. Debtor's Attorney has not returned the signed Adequate Protection

1 Agreement to our office. On our last communication of 12/15/17 he advised he was working  
2 on getting Proof of Payment from Debtor.

3 Respectfully submitted,  
4

5 Date: 12/19/2017

/s/ Merdaud Jafarnia

6 Merdaud Jafarnia, Esq.

7 Attorney for Secured Creditor  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29